

HEARST

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Office of
General Counsel

May 2, 2019

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VIA ECF

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Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMORANDUM ENDORSED

Kenan J. Packman
Maureen Walsh Sheehan
Ravi V. Sitwala
Jack Spizz
Associate General Counsel

Re: **Unopposed Letter Motion
for Extension of Time Regarding Pretrial Materials
Otto v. Hearst Communications, Inc., Case No. 1:17-cv-4712-GHW**

Carolene S. Eaddy
Jennifer G. Tancredi
Debra S. Weaver
Senior Counsel

Dear Judge Woods:

Sultan Barazi
Liddy Barrow*
Nathaniel S. Boyer
Lisa Bozman
Andrea Chui
Adam Colón
Travis P. Davis
Ignacio Diaz*
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Aryn Sobo
Federica Tigani*
Kitty Yang*
Stephen H. Yuhan
Counsel

As you know, we represent Defendant Hearst Communications, Inc. (“Hearst”) in the above-referenced action, in which a bench trial on damages is scheduled to commence on July 15, 2019. The deadline for the submission of pretrial materials is Monday, May 6, 2019. *See* Doc. No. 98. We write to request (i) a one-week extension until May 13, 2019 for the parties to submit all pretrial materials except for any motions *in limine*, and (ii) a two-week extension until May 20, 2019, for the parties to submit motions *in limine*, if any. Counsel for Plaintiff Jonathan Otto consents to this request.

The parties have been working cooperatively in preparing the joint pretrial order, exchanging multiple drafts since April 2. A recent addition to the draft, however, may necessitate motion practice that Hearst did not previously anticipate, and may cause Hearst to adjust various components of its pretrial filings (including direct examination declarations) which, as you know, are to be filed concurrently with the joint pretrial order. Hearst believes that, with this modest extension, the parties may be able to eliminate or narrow their dispute, minimizing the burden on the Court.

This is Hearst’s first request for an extension of this deadline. Mr. Otto made one prior unopposed application for a one-week extension of this

Catherine A. Bostron
Corporate Secretary

* Not admitted or
resident in New York

deadline, which the Court granted.

Respectfully submitted,


/s/ Nathaniel S. Boyer
Nathaniel S. Boyer

cc: Counsel of Record (via ECF)

Application granted. The parties are directed to submit all pre-trial materials other than motions *in limine* no later than May 13, 2019 and motions *in limine* no later than May 20, 2019.

SO ORDERED.

Dated: May 3, 2019
New York, New York



GREGORY H. WOODS
United States District Judge